

UNITED STATES DISTRICT COURT

FOR THE NORTHERN DISTRICT OF CALIFORNIA

IN RE: SOCIAL MEDIA ADOLESCENT  
ADDICTION/PERSONAL INJURY  
PRODUCTS LIABILITY LITIGATION

MDL No. 3047

THIS DOCUMENT RELATES TO:  
ALL ACTIONS

Case Nos.: 4:22-md-03047-YGR-PHK

**OMNIBUS SEALING STIPULATION  
AND ~~PROPOSED~~ ORDER  
REGARDING DKT. NOS. 1197-1198  
(JOINT LETTER BRIEF RE  
PLAINTIFFS' RFP NOS. 16 AND 18)**

Judge: Hon. Yvonne Gonzalez Rogers  
Magistrate Judge: Hon. Peter H. Kang

Pursuant to Civil Local Rules 7-11 and 79-5, the Court's May 22, 2023 Protective Order (Dkt. No. 290), and the August 1, 2023 Order Granting Motion To File Under Seal; Setting Sealing Procedures (Dkt. No. 341), Defendants YouTube, LLC and Google LLC (collectively, "YouTube") and Plaintiffs (collectively, the "Parties") submit this Omnibus Sealing Stipulation in connection with the Parties' Joint Letter Brief re Plaintiffs' RFP Nos. 16 and 18 and its exhibit filed on October 7, 2024. Dkt. Nos. 1197-1198.

At this time, Plaintiffs do not oppose the sealing request and reserve all rights to challenge designations and sealing in the future. Accordingly, the Parties stipulate to the following chart.

1 **I. UNDISPUTED REQUESTS TO MAINTAIN A DOCUMENT UNDER SEAL OR**  
 2 **PROVISIONAL REDACTIONS**

Dkt. No.	Description	Requested Action	Designating Party	Basis for Sealing	Whether Previously Sealed
1197	Joint Letter Brief	Maintain redactions at 2, 4	YouTube	Good cause exists to seal sensitive and confidential information about YouTube's internal research and marketing and business strategies. Disclosure of the information would provide competitors with insights into YouTube's business they would not otherwise have, include trade secrets and competitive information, and thereby cause competitive harm to YouTube. <i>See</i> Declaration of Christopher Chiou ("Chiou Decl.") at 2.	A party has not previously sought to seal the same information.
1197	Joint Letter Brief	Maintain redactions at 1	YouTube	Good cause exists to seal sensitive and confidential information about YouTube's confidential platform design. Disclosure of the information would provide competitors with insights into YouTube's business they would not otherwise have, include trade secrets and competitive information, and thereby cause competitive harm to	A party has not previously sought to seal the same information.

1				YouTube. <i>See</i> Chiou Decl. at 2.	
2	1198-3	Exhibit A to Joint Letter Brief	Maintain redactions at 16:9-10, 16-17	YouTube	Good cause exists to seal sensitive and confidential information about YouTube's confidential platform design. Disclosure of the information would provide competitors with insights into YouTube's business they would not otherwise have, include trade secrets and competitive information, and thereby cause competitive harm to YouTube. <i>See</i> Chiou Decl. at 2.

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15 **IT IS SO STIPULATED AND AGREED.**

16 Respectfully submitted,

17 DATED: October 21, 2024

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8 DATED: October 21, 2024

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26 Plaintiffs' Steering Committee Membership

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## **ATTESTATION**

I, Christopher Chiou, hereby attest, pursuant to N.D. Cal. Civil L.R. 5-1(i)(3), that the concurrence to the filing of this document has been obtained from each signatory hereto.

Dated: October 21, 2024

By: /s/ Christopher Chiou

## Christopher Chiou

## UNITED STATES DISTRICT COURT

## FOR THE NORTHERN DISTRICT OF CALIFORNIA

11 IN RE: SOCIAL MEDIA ADOLESCENT  
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18 **~~[PROPOSED]~~ ORDER ON OMNIBUS  
 19 SEALING STIPULATION  
 20 REGARDING DKT. NOS. 1197-1198  
 21 (JOINT LETTER BRIEF RE  
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23 Judge: Hon. Yvonne Gonzalez Rogers  
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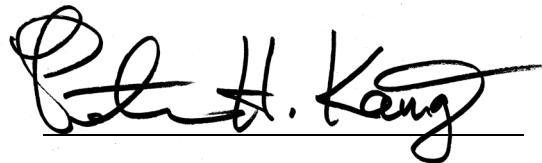
25 Pursuant to Civil Local Rules 7-11 and 79-5 and the Court's May 22, 2023 Protective  
 26 Order (Dkt. No. 290) and August 1, 2023 Order Granting Motion to File Under Seal; Setting  
 27 Sealing Procedures (Dkt. No. 341), and after consideration of the moving papers, supporting  
 28 declaration, the arguments of counsel, and all other matters presented to the Court, the Court  
 rules that good cause exists to seal portions of the following documents relating to Joint Letter  
 Brief re Plaintiffs' RFP Nos. 16 and 18:

Dkt. No.	Description	Requested Action	Court's Ruling
1197	Joint Letter Brief	Maintain redactions at 2, 4	Granted <input checked="" type="checkbox"/>
			Denied <input type="checkbox"/>

Dkt. No.	Description	Requested Action	Court's Ruling
1197	Joint Letter Brief	Maintain redactions at 1	Granted <input checked="" type="checkbox"/> Denied <input type="checkbox"/>
1198-3	Exhibit A to Joint Letter Brief	Maintain redactions at 16:9-10, 16-17	Granted <input checked="" type="checkbox"/> Denied <input type="checkbox"/>

IT IS SO ORDERED.

DATE: October 22, 2024



Hon. Peter H. Kang  
United States Magistrate Judge